



Idaho National Laboratory GMD Workshop

August 27, 2013

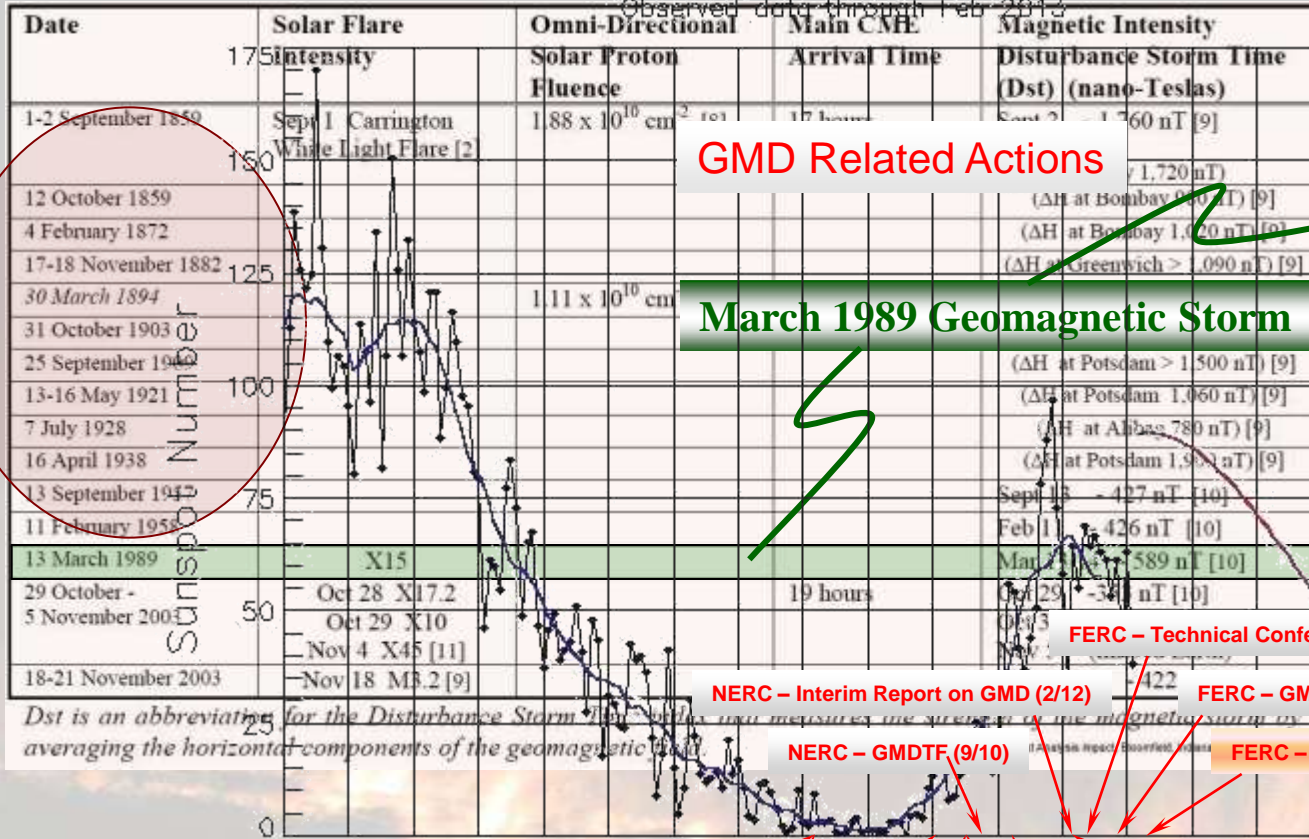
The views and opinions expressed in this presentation are my own and do not necessarily reflect the views of the Federal Energy Regulatory Commission, individual Commissioners, or Commission Staff

Information presented here is from public record or extracted from open and freely available sources

Geomagnetic Storm Levels

ISES Solar Cycle Sunspot Number Progression

Observed data through Feb 2013



GMD Related Actions

March 1989 Geomagnetic Storm

Table 4: Top 30 geomagnetic storms based on Potsdam running Ap

Rank	Ap	Date
1	312	09/18/1941
2	293	11/12/1960
3	285	03/13/1989
4	277	03/24/1940
5	258	10/06/1960
6	252	10/29/2003
7	252	07/15/1959
8	251	03/31/1960
9	241	05/25/1967
10	229	07/13/1982
11	228	02/07/1986
12	226	03/29/1940
13	223	08/04/1972
14	222	07/05/1941
15	221	09/04/1957
16	221	10/30/2003
17	216	07/08/1958
18	214	03/28/1946
19	214	09/22/1946
20	212	03/01/1941
21	212	07/26/1946
22	201	08/19/1950
23	201	09/06/1982
24	199	02/07/1946
25	199	02/11/1958
26	199	05/12/1949
27	192	06/04/1991
28	195	03/24/1946
29	193	05/10/1992
30	192	07/15/2000

FERC – Technical Conference on GMD (4/12)

NERC – Interim Report on GMD (2/12)

FERC – GMD NOPR (10/12)

NERC – GMDTF (9/10)

FERC – GMD Order 779 (5/13)

NAS – Severe Space Weather Workshop (3/08)

UK Defence Committee EMP Threats (2/12)

EMP Commission Report (4/08)

HR 5026 (6/10)

HR 668 (2/11)

ORNL – Metatech Report (1/10)

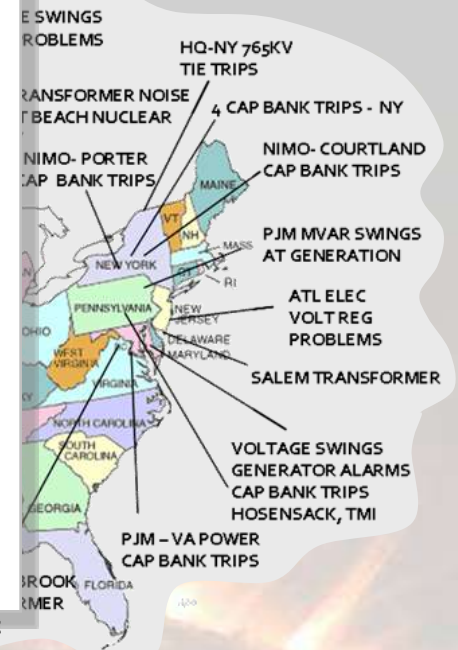
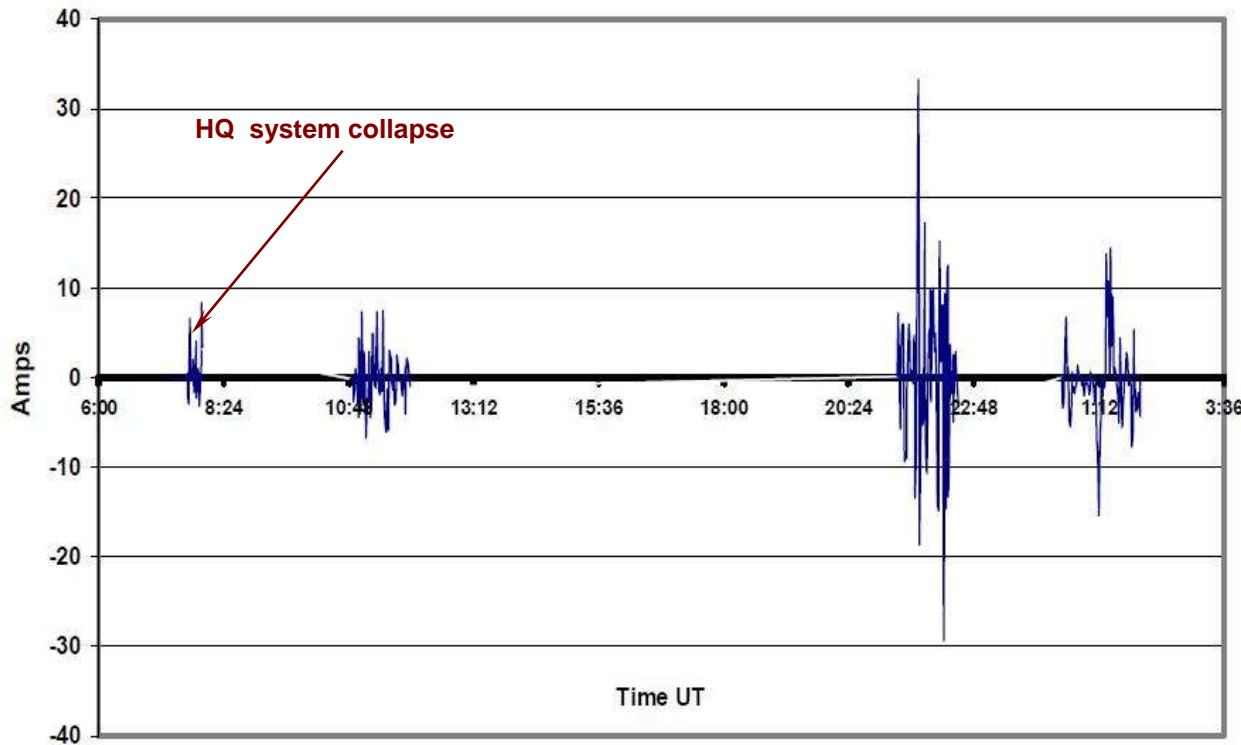
NERC/DOE – HILF REPORT (6/10)

Updated 2013 Mar 4

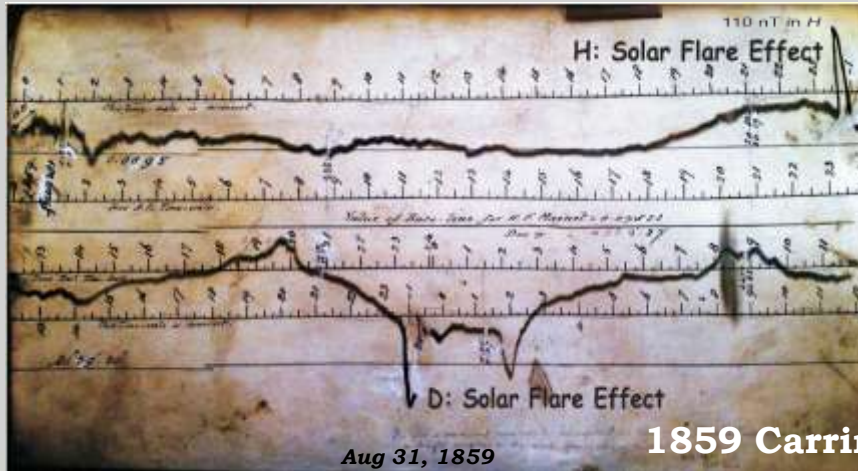
NOAA/SWPC Boulder, CO USA

1989 North American Impacts

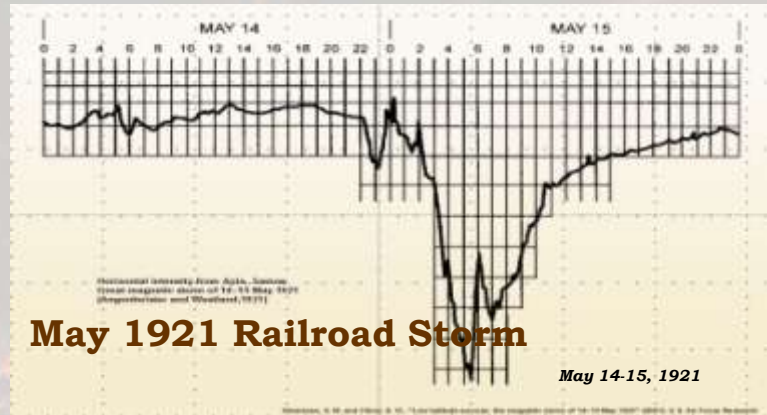
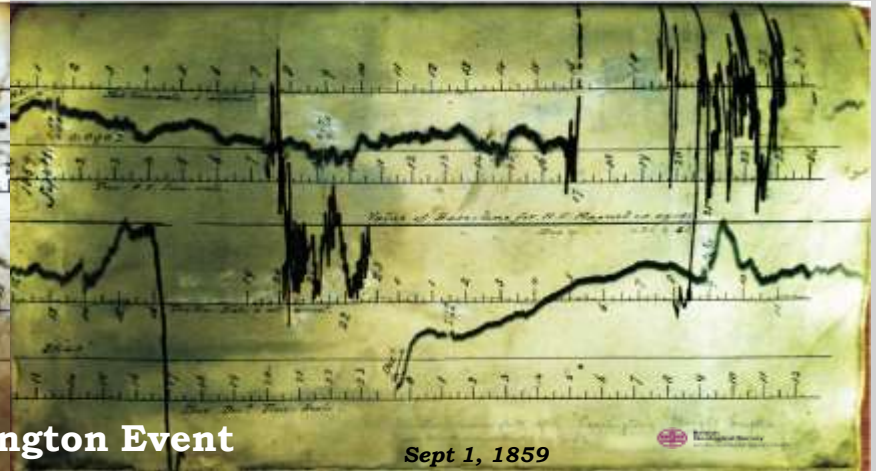
Salem Nuclear Plant Estimated GIC/phase - March 13-14, 1989



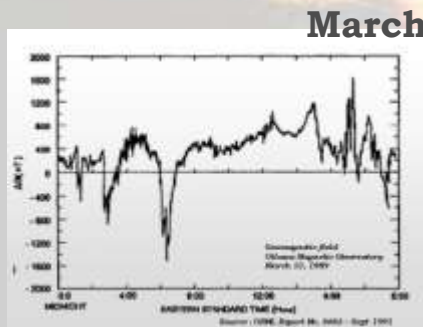
Geomagnetic Storm Comparison



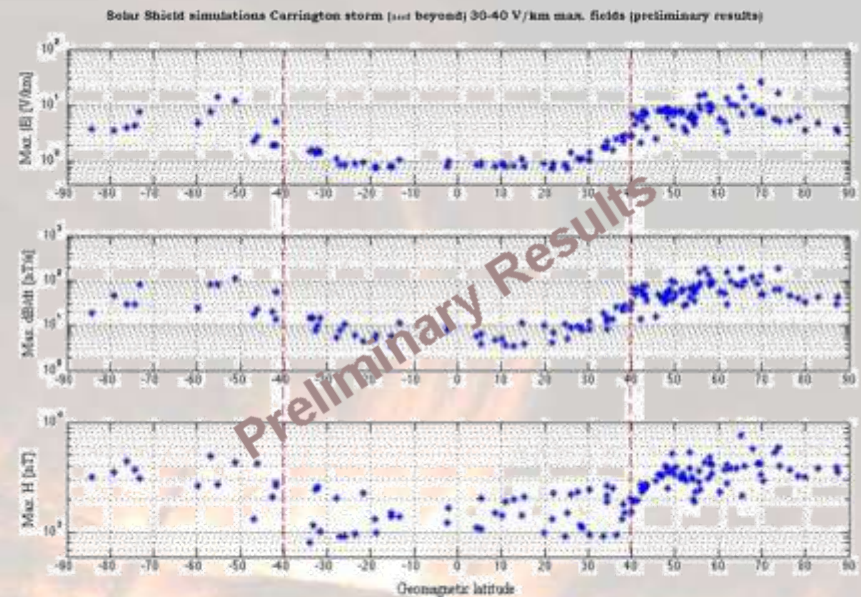
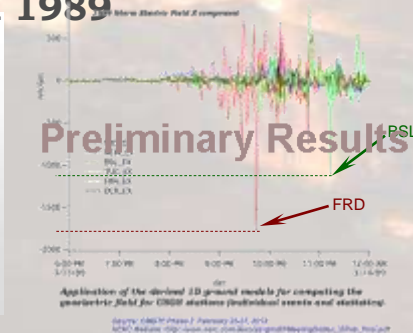
1859 Carrington Event



May 1921 Railroad Storm

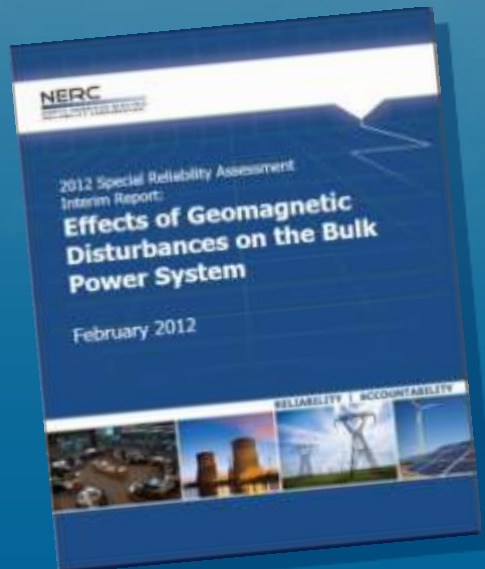
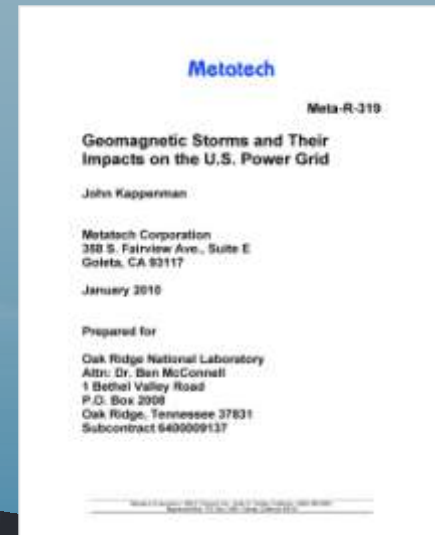


March 1989



E and H Field Simulation (1859)

Reports Relating Geomagnetic Disturbances to Electric Grid Impacts



Chronology of Major Incidents

March 24, 1940 – widespread disturbances, equipment trips, voltage swings

September 22, 1957 – numerous disturbances

February 11, 1958 – Toronto blackout, numerous other disturbances

August 4, 1972 – numerous effects

October 1980 – 500 kV line trip

April 1981 – 500 kV line trip

July 31, 1982 – four transformers and 15 lines tripped

February 7-8, 1986 – numerous effects

March 13-14, 1989 – Hydro-Quebec blackout, widespread problems, transformer damage

September 1989 – voltage problems and relay misoperation

March 24, 1991 – nine line trips, transformer trip, Quebec-New England line trip

October 28, 1991 – line trip Quebec to New England

April 3, 1994 – Transformer failures

May 2, 1998 – widespread effects

July 22, 1998 – effects in Northeastern U.S.

April 6-7, 2000 – numerous problems on Hydro-Quebec and Bonneville

July 17, 2000 – multiple equipment trip incidents in Northeast U.S.

November 6, 2001 – New Zealand transformer loss

October 2003 – Malmo blackout, Transformer damage in South Africa, preventive actions taken in the U.S. appear to circumvent major problems

James Bay	2	Canada
Salem	3	USA
Meadow Brook	1	USA
Nat Grid	2	UK
Transpower	2	New Zealand
Eskom	14	So Africa

Sta 1 GSU #8 - 1989

Sta 2 Trfr #1 - 2003 Sta 2 GSU #4 - 1991

Sta 2 Trfr #1 - 2003 Sta 3 Trfr #1 - 2003

Sta 2 Trfr #2 - 2003 Sta 3 Trfr #2 - 2003

Sta 3 Trfr #4 - 2003 Sta 3 Trfr #3 - 2003

Sta 3 Trfr #4 - 2003 Sta 3 Trfr #5 - 2003

Sta 4 Trfr #6 - 2003 Sta 3 Trfr #6 - 2003

Sta 5 Trfr 2 - 2003

NOAA Space Weather Prediction Center

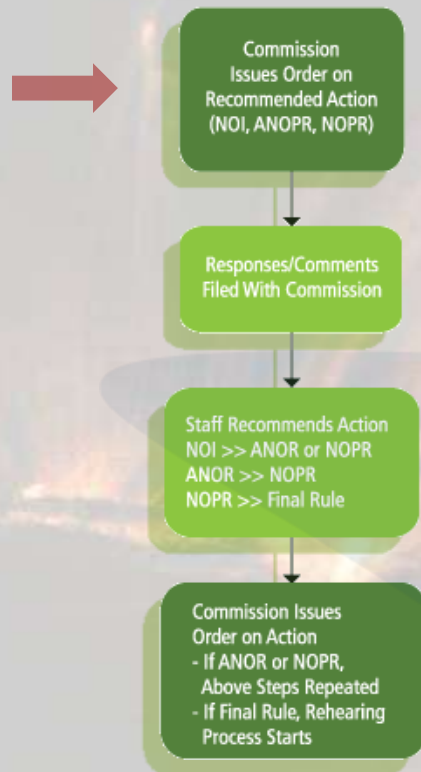
GMD Technical Conference

- Space weather events more severe than we have experienced in modern times have occurred in the past and are likely to occur again
- Large power transformers are unique in their design and you can not make blanket judgments as to whether a particular type or group of transformers will or will not be damaged.
- While there is agreement that reactive power requirements will influence system stability, we do not know at exactly what level it will cause the system to collapse
- In the end, it is indeterminable if transformer damage, system collapse or both will be the most likely consequence of a GMD event; we simply lack the information to draw either conclusion.
- Neither system collapse nor extensive transformer failure is an acceptable result of a GMD event when we have the capability to act to prevent it

Notice of Proposed Rulemaking

Reliability Standards for Geomagnetic Disturbances

RULEMAKING PROCESS Notice of Proposed Rulemaking



DEPARTMENT OF ENERGY

Federal Energy Regulatory
Commission

18 CFR Part 40

[Docket No. RM12-22-000]

Reliability Standards for Geomagnetic
Disturbances

AGENCY: Federal Energy Regulatory
Commission, DOE.

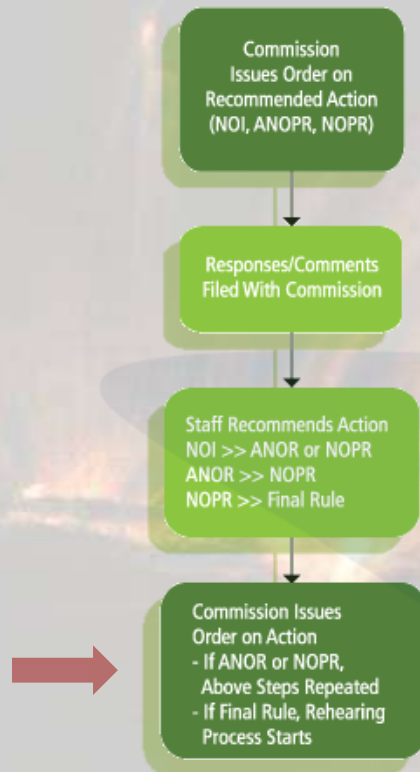
ACTION: Notice of Proposed Rulemaking.

Final Rule - Order 779

Reliability Standards for Geomagnetic Disturbances

RULEMAKING PROCESS

Notice of Proposed Rulemaking



DEPARTMENT OF ENERGY

Federal Energy Regulatory Commission

18 CFR Part 40

[Docket No. RM12-22-000; Order No. 779]

Reliability Standards for Geomagnetic Disturbances

AGENCY: Federal Energy Regulatory Commission.

ACTION: Final rule.

Final Rule – Order No. 779

Reliability Standards for Geomagnetic Disturbances

Commission directs the North American Electric Reliability Corporation to submit for approval Reliability Standards that address the risks posed by geomagnetic disturbances to the Bulk Power System

Goal is to protect against instability, uncontrolled separation, or cascading failures of the Bulk-Power System caused by damage to equipment or otherwise.

Final Rule – Order No. 779 Reliability Standards for Geomagnetic Disturbances

Directive to be implemented in two stages

First stage requires development and implementation of operating procedures to mitigate the effects of GMD

Second stage requires owners and operators to conduct assessments and develop and implement plans to protect against instability, uncontrolled separations and cascading failures.

²²NOFAP, 147 F.2d 838, 80-1,040 at P. 10, n.38 (citing NRC Inertix GMI Report at 79). "Opening procedures are the quickest way to put in place actions that can mitigate the adverse effects of GEC on system reliability. . . . Both system operating and transmission owner organizations need to have appropriate procedures and training in place." *Id.*

¹⁰⁰ NCHC, Interim GMD Report at 80-81.

coordination and conflict the leadership analyses as part of the "Initial Actions" assessments, discussed below. NRC May 21, 2012 Comments at 9. LAOWP proposes that reliability coordinators coordinate these efforts. LAOWP Comments at 3.

Complete and implement the operational plan within six months after approval of the standard

Directs NERC to submit a Reliability Standard within 18 months

Requires owners and operators to conduct initial and on-going vulnerability assessments of the impact of a “benchmark” GMD event

Vulnerabilities assessments are to be consistent with five parameters

- Contain uniform evaluation criteria
- Evaluate primary and secondary effects including GIC originating from and passing to other regions
- Evaluate effects on other BPS equipment
- Conducted on wide area or regional basis
- Updated periodically

Standards that require owners and operators of the Bulk-Power System to conduct initial and on-going assessments of the potential impact of GMDs on Bulk-Power System equipment and the Bulk-Power System as a whole. The NOPR stated that the Reliability Standards would require owners and operators to develop and implement plans based on the needs identified in the assessments.

57. The NOPR proposed to direct the ERD to consider the following parameters as it develops the Second Stage GMD Reliability Standards.

58. First, the Commission proposed that the Reliability Standards should contain uniform evaluation criteria for owners and operators to follow when conducting their assessments.

59. Second, the NOPR stated that the assessments should, through studies and simulations, evaluate the primary and secondary effects of GICs on Bulk-Power System transformers, including the effects of GICs originating from and passing to other regions.⁸⁷

60. Third, the NOPR asserted that the assessments should evaluate the effects of GICs on other Bulk-Power System equipment, system operations, and system stability, including the anticipated loss of critical or vulnerable devices or elements resulting from GIC-related issues.⁸⁸

61. Fourth, in conjunction with assessments by owners and operators of their own Bulk-Power System components, the Commission stated that wide-area or Regional assessments of GIC impacts should be performed. The NOPR noted that a severe GMD event can cause simultaneous stresses at multiple locations on the Bulk-Power System, potentially resulting in a multiple-outage event.⁸⁹ In predicting GIC flows, it is necessary to take into consideration the network topology as an integrated whole (i.e., on a wide-area basis).⁹⁰

62. Fifth, the NOPR proposed that the assessments should be periodically updated, taking into account new facilities, modifications to existing

facilities, and new information, including new research on GMDs, to determine whether there are resulting changes in GMD impacts that require modifications to Bulk-Power System mitigation schemes.

Comments

63. NERC and several commenters generally support requiring GMD vulnerability assessments.⁹¹ NERC states that it supports the NOPR's approach of requiring owners and operators of the Bulk-Power System to conduct vulnerability assessments to determine how critical or vulnerable Bulk-Power System components react to simulated GICs of varying intensities. NERC also states that it appreciates the NOPR's recognition of the need to incorporate new information and research given that the science of GMDs is still evolving.

64. Many commenters that oppose the Second Stage GMD Reliability Standards at this time state that available methods of performing vulnerability assessments are crude and unrefined.⁹² For example, the Trade Associations state that using existing tools “would be asking industry to make assessments . . . and apply solutions at a point when these tools are incapable of doing so without creating risks to reliability that could be greater than any known risk resulting from a severe GMD event.”⁹³ Commenters state that assessments should only be required after the necessary tools and methodologies have been developed and validated and the NERC GMD Task Force has completed its work.

65. Some commenters state that requiring all owners and operators to base their vulnerability assessments on uniform evaluation criteria would not be realistic due to the widely varying geology and geomagnetic latitudes within which the Bulk-Power System is planned and operated.

66. Some commenters state that the Commission should specify the severity of the GMD to assess and plan, although the commenters do not agree on a specific severity.⁹⁴ ITC states that it “believes that there should be a clear engineering benchmark for transmission owner and operators to plan for GMD in a prudent fashion (e.g., a 1 in 100 year GMD event).”⁹⁵ EIS states that, because

the science of GMDs is inexact, an event twice as large as the largest expected GMD should be used as a safety margin.⁹⁶ Other commenters state that establishing a benchmark GMD event is problematic because there is no consensus storm scenario.

Commission Determination

67. We direct NERC, within 18 months of the effective date of this final rule, to submit for approval one or more Reliability Standards that require owners and operators of the Bulk-Power System to conduct initial and on-going vulnerability assessments of the potential impact of benchmark GMD events on Bulk-Power System equipment and the Bulk-Power System as a whole. We agree with commenters that the Second Stage GMD Reliability Standards should specify what severity GMD events (i.e., benchmark GMD events) responsible entities must assess for potential impacts on the Bulk-Power System. However, the Commission declines to specify the severity of the storm or otherwise define the characteristics of these benchmark GMD events in this Final Rule. Rather, NERC, through its standards development process, should identify the benchmark GMD events that responsible entities would have to assess.⁹⁷ Each responsible entity under the Second Stage GMD Reliability Standards would then be required to assess its vulnerability to the benchmark GMD events consistent with the five assessment parameters identified in the NOPR and adopted in this Final Rule.⁹⁸ The NERC standards development process should consider taking planning coordinators, or another functional entity with a wide-area perspective, to coordinate assessments across Regions under the Second Stage GMD Reliability Standards to ensure consistency and regional effectiveness.

68. The comments that oppose requiring assessments stress that there is a substantial amount of work being done by the NERC GMD Task Force and industry to develop and validate tools, models, and data to perform the vulnerability assessments. We recognize that the tools for assessing GMD vulnerabilities are not fully mature. To address this concern, NERC should

⁸⁷ EIS Comments at 6.

⁸⁸ See, e.g., NERC Comments at 14 (Joint ITC/ITOs Comments at 10, ITC Comments at 1); PJM Comments at 3–4; IEP Comments at 2.

⁸⁹ See, e.g., Trade Associations Comments at 30; EIS Comments at 8.

⁹⁰ Trade Associations Comments at 4.

⁹¹ See, e.g., GLA Comments at 4–5; ITC Comments at 6.

⁹² ITC Comments at 4.

⁹³ NERC, 181 FERC ¶ 81,045 at PP 28–32.

⁹⁴ Similar work is already being done in Phase 2 of the NERC GMD Task Force Plan. The GMD Task Force Phase 2 Scope and Project Plan states that the NERC GMD Task Force will “define and improve a set of defined reference storms (most severe occurrences in a 100-year time horizon) and support ongoing research to identify the maximum theoretical GMD.” GMD Task Force Phase 2 Scope and Project Plan at 3.

⁹⁵ NERC, 181 FERC ¶ 81,045 at PP 28–32.

⁸⁷ The NOPR described damage to Bulk-Power System components as a primary effect of GICs and production of harmonics that are not present during normal Bulk-Power System operation and increased transformer absorption of reactive power as secondary effects of GICs. NOPR, 181 FERC ¶ 81,043 at P 15.

⁸⁸ The Oak Ridge Study Associates included GMD modeling, simulations and review of storm impacts, power grid GIC flows and reactive power demands, transformer loading and risk of potential damage to transformers. See generally Oak Ridge Study 2010 Report.

⁸⁹ Oak Ridge Study 2010 Report at pages A1–1.

A1–2.

⁹⁰ Id. at page 1–17.

Comments

75. NERC states that the Second Stage GMD Reliability Standards should be technology-neutral and should not require dedicated blocking devices or other specific equipment. NERC further states that it is currently unable to verify whether a specific blocking device is appropriate.

76. A majority of commenters state that blocking devices need further study and that the Commission should clarify that the Second Stage GMD Reliability Standards will not require responsible entities to install blocking devices or require installation of any particular type of mitigation.¹⁰⁰ Bonneville, for example, states that the "capability to perform studies that include transformer thermal models needed for developing appropriate mitigation plans and blocking strategies will likely not be available for use until the end of the 2014 at the earliest."¹⁰¹ Commenters also express concern with the statement in the NOPR that plans for addressing GMD vulnerabilities cannot be limited to operational procedures or enhanced training alone because the commenters understand this language to require the installation of automatic blocking devices. PJM requests that the Reliability Standards explicitly state that equipment owners, not system operators, are the responsible entities.¹⁰²

77. Some commenters state that the Second Stage GMD Reliability Standard should not require responsible entities to implement a plan that prevents cascading failures but instead support a Reliability Standard that allows NERC to determine the appropriate mix between prevention and timely restoration of the Bulk-Power System. Commenters also express concern with the language in the NOPR that, under the Second Stage GMD Reliability Standards, responsible entities would be required to "develop and implement a plan so that instability, uncontrolled separation, or cascading failures of the Bulk-Power System, caused by damage to critical or vulnerable Bulk-Power System equipment, or otherwise, will not occur as a result of a GMD." Commenters state that such a standard imposes strict liability on responsible entities and is inconsistent with the unpredictable and uncontrolled nature of GMD events.

78. Other commenters express support for hardening elements of the

Bulk-Power System as an option to protect against GMD events.¹⁰³ Some of these commenters state that operational procedures alone do not prevent the flow of GICs through Bulk-Power System elements; instead, operational procedures are intended to prevent the Bulk-Power System from collapsing, which exposes equipment to GICs for longer periods. EIS states that a combination of operational procedures and hardware is needed to protect the Bulk-Power System. Foundation states that relying on operational procedures alone, based on warnings from space weather observations, renders the Advanced Composition Explorer satellite, which gives details about an approaching GMD, a single point of failure in protecting the Bulk-Power System. Commenters also state that the benefits afforded by operational procedures are unpredictable because the state of the Bulk-Power System (e.g., load, available generation, unplanned equipment outages) at the time of a GMD event cannot be known in advance.

Commission Determination

79. We direct NERC, within 18 months of the effective date of this Final Rule, to submit for approval one or more Reliability Standards that, assuming the assessments identify potential impacts from a benchmark GMD event, require owners and operators of the Bulk-Power System to develop and implement a plan to protect against instability, uncontrolled separation, or cascading failures of the Bulk-Power System, caused by damage to critical or vulnerable Bulk-Power System equipment, or otherwise, as a result of a benchmark GMD event. Owners and operators of the Bulk-Power System cannot limit their plans to considering operational procedures or enhanced training, but must, subject to the vulnerabilities identified in the assessments, contain strategies for protecting against the potential impact of any benchmark GMD event based on factors such as the age, condition, technical specifications, system configuration, or location of specific equipment. These strategies could, for example, include automatically blocking GICs from entering the Bulk-Power System, instituting specification requirements for new equipment, inventory management, and isolating certain equipment that is not cost effective to retrofit, or a combination thereof.

80. A major concern raised in the comments is that the NOPR proposed to require responsible entities to utilize automatic blocking devices. However, the NOPR explicitly stated that it did not propose to require a particular solution in the Second Stage GMD Reliability Standards to address GMD vulnerabilities. The NOPR only stated that it expected that some assessments will demonstrate that automatic blocking is necessary in some instances. While the NOPR proposed to provide guidance with respect to the use and evaluation of automatic blocking devices, the NOPR did not propose to require the use of automatic blocking devices.

81. In this Final Rule, we do not direct the ERD to develop Reliability Standards that require the use of automatic blocking devices or any specific technology. We agree with NERC that the Reliability Standards should be technology-neutral.¹⁰⁴ Instead, the Second Stage GMD Reliability Standards should require owners and operators of the Bulk-Power System to develop and implement a plan to protect against instability, uncontrolled separation, or cascading failures of the Bulk-Power System, caused by damage to critical or vulnerable Bulk-Power System equipment, or otherwise, as a result of a benchmark GMD event. In the NOPR, we identified a non-exhaustive list of possible automatic measures for doing so, including automatically blocking GICs from entering the Bulk-Power System, instituting specification requirements for new equipment, inventory management, and isolating certain equipment that is not cost effective to retrofit.

82. As with the First Stage GMD Reliability Standards, the responsible entities should perform vulnerability assessments of their own systems and develop the plans for mitigating any identified vulnerabilities. We take no position in this Final Rule on which functional entities should be responsible for compliance under the Second Stage GMD Reliability Standards. However, the NERC standards development process should consider tasking planning coordinators, or another functional entity with a wide-area perspective, to coordinate mitigation plans across Regions under the Second Stage GMD Reliability Standards to ensure consistency and regional effectiveness. We clarify that if a responsible entity performs the required GMD vulnerability assessments and finds no potential GMD impacts, no

Directs NERC to submit a Reliability Standard within 18 months

Requires owners and operators develop and implement a plan to protect against instability, uncontrolled separation or cascading failures

Cannot limit the plans to operational procedures or enhanced training ... but must contain strategies for protection against and benchmark GMD event

¹⁰⁰ See, e.g., Trade Associations Comments at 32; Joint ORE-WECC Comments at 18; Bonneville Comments at 7; Iteken Comments at 11-12.

¹⁰¹ Bonneville Comments at 8.

¹⁰² PJM Comments at 4-5.

¹⁰³ See, e.g., PJM Comments at 4; Bonneville Comments at 7.

¹⁰⁴ NERC Comments at 4.

Reliability Standards.¹²⁰ Joint ISOs/ ITOs propose a one-year development and filing deadline.¹²¹ Idaho Power proposes an 18-month deadline for submitting the Reliability Standards and a three-year, multi-phased implementation period.¹²² Exelon recommends that NERC should propose a filing deadline.¹²³

90. Commenters opposing the Second Stage GMD Reliability Standards state that the development of Second Stage GMD Reliability Standards should be delayed given the need for further research into GMDs and the continuing work of the NERC GMD Task Force.

Commission Determination

91. In its comments, NERC commits to meeting the six-month submission deadline proposed in the NOPR. However, based on the concerns raised in the comments, we modify the schedule in the NOPR and direct NERC to submit the proposed Second Stage GMD Reliability Standards within 18 months of the effective date of this Final Rule. While NERC should propose an implementation plan, we do not direct or suggest a specific implementation plan. As stated in the NOPR, in a proposed implementation plan, we expect that NERC will consider a multi-phased approach that requires owners and operators of the Bulk-Power System to prioritize implementation so that components considered vital to the reliable operation of the Bulk-Power System are protected first. We also expect, as discussed above, that the implementation plan will take into account the availability of validated tools, models, and data that are necessary for responsible entities to perform the required GMD vulnerability assessments.

III. Information Collection Statement

92. The Office of Management and Budget (OMB) regulations require approval of certain information collection requirements imposed by agency rules. Upon approval of a collection(s) of information, OMB will assign an OMB control number and an expiration date. Respondents subject to the filing requirements of an agency rule will not be penalized for failing to respond to these collections of information unless the collections of information display a valid OMB control number. The Paperwork Reduction Act (PRA) requires each

federal agency to seek and obtain OMB approval before undertaking a collection of information directed to ten or more persons, or contained in a rule of general applicability.

93. The Commission is submitting these reporting requirements to OMB for its review and approval under section 3507(d) of the PRA. The Commission solicited comments on the Commission's need for this information, whether the information will have practical utility, ways to enhance the quality, utility, and clarity of the information to be collected, and any suggested methods for minimizing the respondent's burden, including the use of automated information techniques. The Commission received no comments on the burden and cost information contained in the NOPR.

94. The Public Reporting Burden and cost related to the proposed rule in Docket RM12-23-000 are covered by, and already included in, the existing FERC-725, Certification of Electric Reliability Organization; Procedures for Electric Reliability (OMB Control No. 1902-0225). FERC-725 includes the ERO's overall responsibility for developing Reliability Standards, such as the Reliability Standards for Geomagnetic Disturbances.

95. Internal review: The Commission has reviewed the proposed changes and has determined that the changes are necessary to ensure the reliability and integrity of the Nation's Bulk-Power System.

96. Interested persons may obtain information on the reporting requirements by contacting: Federal Energy Regulatory Commission, 888 First Street NE., Washington, DC 20426 (Attention: Ellen Brown, Office of the Executive Director, email: DataClearance@ferc.gov; Phone: (202) 502-0663, fax: (202) 275-0873). Comments on the requirements of this rule may also be sent to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503 (Attention: Desk Officer for the Federal Energy Regulatory Commission). For security reasons, comments should be sent by email to OMB at oir_submission@omb.eop.gov. Please reference OMB Control No. 1902-0225, FERC-725 and the docket number of this proposed rulemaking in your submission.

IV. Environmental Analysis

97. The Commission is required to prepare an Environmental Assessment or an Environmental Impact Statement for any action that may have a significant adverse effect on the human

environment.¹²⁴ The Commission has categorically excluded certain actions from this requirement as not having a significant effect on the human environment. Included in the exclusion are rules that are clarifying, corrective, or procedural or that do not substantially change the effect of the regulations being amended.¹²⁵ The actions proposed here fall within this categorical exclusion in the Commission's regulations.¹²⁶

V. Regulatory Flexibility Act

98. The Regulatory Flexibility Act of 1980 (RFA)¹²⁷ generally requires a description and analysis of proposed rules that will have significant economic impact on a substantial number of small entities. The RFA mandates consideration of regulatory alternatives that accomplish the stated objectives of a proposed rule and that minimize any significant economic impact on a substantial number of small entities. The Small Business Administration's (SBA) Office of Size Standards develops the numerical definition of a small business.¹²⁸ The SBA has established a size standard for electric utilities, stating that a firm is small if, including its affiliates, it is primarily engaged in the transmission, generation and/or distribution of electric energy for sale and its total electric output for the preceding twelve months did not exceed four million megawatt hours.¹²⁹

99. The NOPR stated that, by proposing only to direct NERC, the Commission-certified ERO, to develop GMD Reliability Standards, the proposal would not have a significant or substantial impact on entities other than NERC. The NOPR stated that the ERO develops and files with the Commission for approval Reliability Standards affecting the Bulk-Power System, which represents (a) a total electricity demand of 630 gigawatts (630,000 megawatts) and (b) more than \$1 trillion worth of assets. Therefore, the NOPR certified

¹²⁰ Regulations implementing the National Environmental Policy Act of 1969, Order No. 486, 52 FR 47807 (Dec. 17, 1987), 16 USC Stats. & Regs. Promulg. 1000-1000 § 30.703 (1987).

¹²¹ 16 CFR 100.41d(2)(ii).

¹²² Only one commentor, S2NS, addressed the NOPR's Environmental Analysis proposal. S2NS requested that the Commission "include an environmental impact assessment of GMD-induced power outages on the approximately 200 resident power plants in the United States if the proposed rules are not enacted." S2NS Commenters at 5 (emphasis in original). The request in this comment is moot in light of the Commission's directive in this Final Rule that the ERO develop and submit for approval proposed GMD Reliability Standards.

¹²³ 4 U.S.C. 101-012.

¹²⁴ 16 CFR 121.201.

¹²⁵ 16 CFR 121.201, Section 22, Utilities & E.

Directs NERC to submit a Reliability Standard within 18 months

Requires owners and operators develop and implement a plan to protect against instability, uncontrolled separation or cascading failures

Cannot limit the plans to operational procedures or enhanced training ... but must contain strategies for protection against and benchmark GMD event

The order directs NERC to propose and implementation plan containing a multi-phased approach that requires prioritizes implementation so that components considered vital to the operation of the BPS are protected first.

¹²⁴ See, e.g., LADPP Comments at 3; Joint ISOs/ ITOs Comments at 4-5.

¹²⁵ Joint ISOs/ ITOs Comments at 24.

¹²⁶ Idaho Power Comments at 2.

¹²⁷ Exelon Comments at 14.

SUMMARY

The GMD Order has a two stage approach:

- First stage – an interim step consisting of operating procedures that can afford some degree of protection
- Second stage – system wide assessment and the development and implementation of a plan that protects against instability, uncontrolled separation or cascading failures as a result of a “benchmark” GMD event.

Stage one standards to be submitted by January 22, 2014

Stage two standards to be submitted by due January 22, 2015

